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REMARKS

The Office Action dated March 9, 2006 has been received and carefully considered. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Anticipation Rejection of Claims 1-6, 8, 10-21, 23-32, and 34

At page 2 of the Office Action, claims 1-6, 8, 10-21, 23-32, and 34 were rejected under 35 U.S.C. Section 102(e) as being anticipated by MacInnis (U.S. Patent No. 6,570,579). This rejection is hereby respectfully traversed.

Claim 1 recites "receiving configuration data that indicates, for each client of a plurality of clients, which memory controller of a plurality of memory controllers will support the client" and "routing each of the one or more data access requests from the router to a corresponding memory controller of the plurality of memory controllers based on the configuration data and based on the tag associated with each of the one or more data access requests." These elements are not disclosed or suggested by MacInnis.

MacInnis discloses a dual memory system including a memory select block 1100. The memory select block 1100 routes the memory requests to a first arbiter 1102 or to a second arbiter 1106 based on the address of the requested memory. MacInnis, col. 53, lines 3-27. Thus MacInnis does not route data access requests based on on a tag associated with the data access request. Instead, MacInnis routes requests based on a memory address. As explained in the specification at page 4, a tag can provide information about the client that initiated the request as well as the purpose of the request. A memory address does not provide this information. Accordingly, MacInnis fails to disclose each and every element of claim 1.

Further, MacInnis does not disclose receiving configuration data that indicates, for each client of a plurality of clients, which memory controller of a plurality of memory controllers will support the client as recited in claim 1. According to the Office Action, configuration data is "inherently included" in MacInnis "to identify which memory controller will support the requesting client. Office Action, p.4 (emphasis added). However, the fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency

of that result or characteristic. *In re Rijckaert*, 9 F.3d 1531, 1534 (Fed. Cir. 1993). In addition, "To establish inherency, the extrinsic evidence 'must make clear that the missing descriptive matter is necessarily present in the thing described in the reference, and that it would be so recognized by persons of ordinary skill. Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.'" *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999) (citations omitted). The Office has made no showing that the system of MacInnis necessarily receives configuration data that indicates, for each of a plurality of clients, which memory controller of a plurality of memory controllers will support the client. For example, the memory select block 1100 of MacInnis could be designed so that the addresses associated with a particular memory controller are hardwired, rather than received. Accordingly, the Office has failed to make a *prima facie* case that MacInnis inherently discloses receiving configuration data that indicates, for each client of a plurality of clients, which memory controller of a plurality of memory controllers will support the client as recited in claim 1.

Claims 2-6, 8, 10-21, 23 and 42-43 depend from claim 1. Accordingly, MacInnis fails to disclose or suggest each and every element of these claims, at least by virtue of their dependency on claim 1. Moreover, these claims recite additional non-obvious features.

With respect to claim 24, the claim recites:

a storage module having a memory location and an output port, the memory location to store configuration data;

...

a router having a plurality of first input ports coupled to the data access port of each of the plurality of clients, a second input port coupled to the output port of the storage module, a first plurality of output ports, and a second plurality of output ports, wherein the router is to route data at each one of the plurality of first input ports to a respective output port of the first or second plurality of output ports based upon the configuration data stored in the storage module and based upon a tag associated with the data.

As explained above, MacInnis does not disclose configuration data. Accordingly, MacInnis necessarily fails to disclose a memory location to store configuration data, as recited in claim 24. Further, as explained above, MacInnis does not disclose a router that routes data to different data

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ports based on a tag associated with the data. Accordingly, MacInnis fails to disclose each and every element of claim 24.

Claims 25-32 and 34 depend from claim 24. Accordingly, MacInnis fails to disclose or suggest each and every element of these claims, at least by virtue of their dependency on claim 24. Moreover, these claims recite additional non-obvious features.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 1-6, 8, 10-21, 23-32, and 34 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Anticipation Rejection of Claims 35-41

At page 5 of the Office Action, claims 35-41 were rejected under 35 U.S.C. Section 102(e) as being anticipated by Artieri (U.S. Patent No. 6,104,751). This rejection is hereby respectfully traversed.

Claim 35 recites "receiving a first client request from a first video decoder." This element is not disclosed or suggested by Artieri. The Office Action states that this element is disclosed by Artieri in FIG. 3. *Office Action*, p. 6. FIG. 3 illustrates a FIFO 20 that provides requests RQ to a memory controller 24. Thus, Artieri discloses receiving a request *from a FIFO* rather than receiving a first client request *from a first video decoder* as recited in claim 35.

The Office Action indicates at page 2 that components 10-14, 16, 18, 20-22, and 26 of FIG. 3 together disclose a video decoder. However, as illustrated by FIG. 8 of Artieri, these components *together with the memory controller 24* are the video decoder. In particular, Artieri states that "FIG. 8 represents four MPEG decoders connected so as to process the four slices of the high definition picture." *Artieri*, col. 20, lines 14-15. As illustrated in FIG. 8, each of the MPEG decoders receives the input signal "CDin." As illustrated in FIG. 3, this is the input signal received by the FIFO 20 that generates the requests RQ. Accordingly, the requests RQ are not *received from* one of the MPEG decoders, but are generated *internal to* one of the MPEG decoders. Therefore, Artieri does not disclose or suggest receiving a first client request from a video decoder. Thus, Artieri fails to disclose each and every element of claim 35.

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Claims 36-41 depend from claim 35. Accordingly, Artieri fails to disclose or suggest each and every element of these claims, at least by virtue of their dependency on claim 35. Moreover, these claims recite additional non-obvious features.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 35-41 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 7 and 9

At page 7 of the Office Action, claims 7 and 9 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over MacInnis in view of Kilgariff (U.S. Patent No. 5,999,183). This rejection is hereby respectfully traversed.

Claims 7 and 9 depend from claim 1. As set forth above, MacInnis does not disclose or suggest each and every element of claim 1. Moreover, Kilgariff does not disclose or suggest those elements lacking in MacInnis. Accordingly, MacInnis and Kilgariff, individually and in combination, fail to disclose each and every element of claims 7 and 9, at least by virtue of their dependency on claim 1.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 7 and 9 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 22 and 33

At page 9 of the Office Action, claims 22 and 33 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over MacInnis in view of Foster (U.S. Patent No. 6,240,492). This rejection is hereby respectfully traversed.

Claim 22 depends from claim 1. As set forth above, MacInnis does not disclose or suggest each and every element of claim 1. Moreover, Foster does not disclose or suggest those elements lacking in MacInnis. Accordingly, MacInnis and Foster, individually and in combination, fail to disclose each and every element of claim 22, at least by virtue of its dependency on claim 1.

Claim 33 depends from claim 24. As set forth above, MacInnis does not disclose or suggest each and every element of claim 1. Moreover, Foster does not disclose or suggest those elements lacking in MacInnis. Accordingly, MacInnis and Foster, individually and in

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combination, fail to disclose each and every element of claim 33, at least by virtue of its dependency on claim 24.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 22 and 33 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Conclusion

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Respectfully submitted,

5/9/06

Date



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